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George V. Voinovich
Governor

November 14, 1997

RE: DOE FEMP
COMMENTS: WORK PLAN FOR RECYCLING, SUPPLEMENTAL PROJECTS

Mr. Johnny Reising
U.S. Department of Energy, Fernald Area Office
P.O. Box 538705
Cincinnati, OH 45253-8705

Dear Mr. Reising:

Ohio EPA, in consultation with the Ohio Department of Health Bureau of Radiation, has reviewed the DOE document, "Submittal of Work Plan for Recycling, Supplemental Projects" received on September 15, 1997. Ohio EPA's comments on the document are included below:

1) Commenting Organization: OEPA Commenter: OFFO
Section #: Pg. #: Line #: Code: M
Original Comment #:
Comment: The document does not provide sufficient cost justification. Additional data from on-site recycling efforts as well as vendor data should be provide. The cost calculations should take into account the value of the recycled steel as well as the costs saved from not having to undergo disposal. Based upon information Ohio EPA has received regarding recycling costs, disposal costs and recycled steel value during work on the Recycling Methodology effort, we believe the amount of steel that could be recycled for the SEP dollar value is approximately twice that proposed.

2) Commenting Organization: OEPA Commenter: OFFO
Section #: Pg. #: Line #: Code: M
Original Comment #:
Comment: Considering both the national and state level implications of defining a volumetric release limit, it is Ohio EPA's opinion that recycling of the copper ingots is not an appropriate component of the SEP. The original SEP language did not mention the copper ingots or Ohio EPA would have raised this issue during the OU4 negotiations. Additionally, the SEP should be readily implementable and without significant regulatory hurdles. Ohio EPA believes both the stakeholder and regulatory issues associated with this component of the SEP make it unlikely to achieve a timely success. Ohio EPA does consider additional work/discussions, separate of the

SEP, on the copper recycling issue to be warranted and likely valuable.

3) Commenting Organization: OEPA Commenter: ODH/OFFO
Section #: Pg. #: Line #: Code: M
Original Comment #:
Comment: Should DOE decide to pursue recycling of the copper ingots outside of the SEP, the following issues will need to be addressed:

a) The complete details for sampling and analysis of the copper ingots are necessary in order to lend credence to the assertion of volumetric uranium contamination of 4.25 pCi/g and no other radiological contaminants present.

b) Though reported values are low, typically radiological contamination surveys include count rates with associated errors in addition to contact dose rates.

c) To be compliant with ARARs, other regulatory agencies which may have purview over possible end uses of the copper should be contacted. One example is the FDA as one of the modeled scenarios, granted a low probability use, includes an internal medical device.

d) Two sources state differing values if the volumetric contamination were evenly distributed over the surface of each ingot. A value of 31 dpm/100cm^2 is stated in the September 1997 "Authorized Limits for Fernald Copper Ingots" while a July 1997 press release from Fernald titled "Copper Ingot Disposition Alternatives" gives a value of 11dpm/100 cm^2. As reported, both of these would be well below accepted surface release limits. What is the technical basis for arriving at these values? Our calculations show a significantly higher number.

If you have any questions, please contact me.

Sincerely,

Thomas A. Schneider
Fernald Project Manager
Office of Federal Facilities Oversight

cc: Jim Saric, U.S. EPA
Terry Hagen, FDF
Ruth Vandegrift, ODH
Manager, TPSS/DERR,CO
Francie Barker, Tetra Tech EM Inc.
Mark Shupe, HSI GeoTrans

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